REMARKS

Claims 1 - 26 were submitted for examination. In this Office Action, Claims 1-26 are rejected under 35 USC 103(a) as being unpatentable over G. Omura "Mastering AutoCAD Release 11", 4th Edition, Symbex, Inc. 1991 (hereinafter "CAD") in view of Ambrosius "TAG1.LSP" HyperPics, copyright 1998, pages 1-2 (hereinafter "TAG1").

The Examiner is appreciated for his thoughtful examination and comments in the Office Action. To further distinguish from the cited references, the Applicant has cancelled Claims 7, 14 and 21, and amended Claims 1, 8, 10, 13, 15, 17-19 and 22 in the foregoing amendments. No new matters have been introduced. Reconsideration of pending claims 1-6, 8-13, 15-20 and 22-26 is respectfully requested.

As amended, Claim 1 recites:

providing a working image that includes a number of objects;
determining label parameters for labels to be associated with at least some of the
    objects, wherein the label parameters determine a style of the labels and a
    preferable increment set by a user in accordance with how the image is used;
placing a first label in the working image when one of the objects is selected;
placing a second label in the working image when another one of the objects is
    selected, wherein the second label is automatically generated in accordance with
    the label parameters, and the second label is different from the first label by the
    increment.

(*Emphasis added*)

Claim 1 now recites that the style of the labels and the increment are determined by a user in accordance with how the image is used. In other words, depending on how a resultant image is used, the user can specify that a label may appear as a circle, a triangle, a square or a level of transparency of the labels (*see* paragraphs [0022] and [0044]), and the increment may be anything such as numerals, alphabets, or alphanumeric characters (*see* paragraph [0040]).

In contrast, TAG1 shows that in the while loop:

```
(while (setq PT (getpoint "\nInput center point for tag: "))
    (command "circle" PT (/ (getvar "dimscale") 4.0)
            "text" "m" PT (/ (/ (getvar "dimscale") 4.0) 2) 0 (itoa TAGNUM)
        )
```

```
    (setq TAGNUM (1+ TAGNUM))
  )
```

all labels are pre-fixed. When the lisp program TAG1.LSP is executed, a user can specify a starting number that is assigned to a variable TAGNUM, and a center point for a label. The lisp program then automatically generates a circle label numbered TAGNUM and placed at the center point. When the user enters another center point, the lisp program automatically generates another circle label numbered (TAGNUM+1) and placed at the center point. Essentially the user is prevented from defining or modifying the desirable labels he/she wants in the image being labeled once the lisp program is started.

The Examiner has agreed that CAD does not specifically teach the setting of parameters for labels to be associated with objects, nor does CAD teach automatically generating and incrementing a second label when another object is selected. As Claim 1 is now amended, the Applicant respectfully submits that TAG1, viewed alone or in combination with CAD, does not teach nor suggests "the label parameters determine a style of the labels and a preferable increment set by a user in accordance with how the image is used". Accordingly, the once-amended Claim 1 shall be allowable over the cited references.

In particular, the Applicant wishes to refer the Examiner to carefully reconsider the rejection of Claims 9 and 10. Specifically, Claim 9 recites that "one of the labels is associated with an annotation box in which a user can type in texts" which is clearly shown in FIG. 3F. The reason the Examiner rejects the claim is based on CAD that teaches text as labels. If the Examiner looks at the example in Figure 8.5 on page 229 of CAD, it can be understood that such text labels are actually text annotations that are neither associated with a label nor incremented with labels. In other words, the text label "Balcony" entered would have nothing to do with another text label "Bath", there is simply no any sequential relationship between the text labels. In contrast, as recited in claims 1 and 9, an annotation box is associated with a label that has a sequential relationship with other labels. Accordingly, neither CAD nor TAG1 teaches or suggests Claim 9.

Claim 10 is also believed significantly different from the cited references. The only place that the Examiner relies upon is pages 241-247 of CAD that, as agreed by the Examiner, teaches *modifying text*. However, Claim 10 recites "resetting the label parameters; and causing the labels that have been placed in the working image to change automatically in accordance with the label parameters". In other words, after placing a number of labels in the image, a user suddenly decides to alter the label parameters for *the next label to be placed*. As a result of the changed label parameters, those labels that *are already placed* in the image will be automatically changed to synchronize with the next label to be placed. Evidently, neither CAD nor TAG1 has taught or suggested such combined features recited in Claim 1 and 10. Accordingly, CAD or TAG1 fail to teach or suggest Claim 10.

Accordingly, the Applicant submits that CAD and TAG1, viewed alone or in combination, neither teaches nor suggests the combined features recited in the once-amended Claims 1-6 and 8-12, and respectfully requests the Examiner to reconsider Claims 1-6 and 8-12 in view of the above facts and arguments.

Claims 13 and 18 are also amended to incorporate similar features recited in Claim 1. The Applicant wishes to apply the above reasons to support Claims 13, 15-20, and 22-26 and respectfully submits that the combined features recited in Claim 13 or 18 are neither taught nor suggested by CAD or TAG1, viewed alone or in combination, It is believed that claims 13, 15-20, and 22-26 shall be allowable over the cited references. Reconsideration of claims 13, 15-20, and 22-26 is respectfully requested.

In view of the above amendments and remarks, the Applicant believes that Claims 1-6, 8-13, 15-20 and 22-26 shall be in condition for allowance over the cited references. Early and favorable action is being respectfully solicited.

If there are any issues remaining which the Examiner believes could be resolved through either a Supplementary Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at (408)777-8873.

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Respectfully submitted;

Joe Zheng
Reg. No.: 39,450

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to "Commissioner of Patents and Trademarks, Washington, DC 20231", on March 2, 2006.

Name:___Joe Zheng____

Signature:_____